

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

WB BRIDGE HOTEL LLC AND
159 BROADWAY MEMBER LLC,

DEBTORS.

Case No.: 20-23288 (KYP)
and
Case No. 20-23289 (KYP)
(Jointly Administered)

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NAT WASSERSTEIN, as TRUSTEE of the
WB BRIDGE CREDITOR TRUST,

Plaintiff,

-against-

Adv. Pro. No. 22-07059 (KYP)

NAT WASSERSTEIN, as TRUSTEE of the WB BRIDGE
CREDITOR TRUST,

Plaintiff,

-against-

AFFIRMATION

206 KENT INVESTOR II LLC, 206 KENT
INVESTOR III LLC, 206 KENT INVESTOR LLC,
206 KENT MEZZ LLC,
CORNELL 46 LLC, CORNELL 159 LLC,
CORNELL 245-247 LLC, CORNELL 251-247 LLC,
CORNELL 251-253 LLC, CORNELL 251253 LLC,
CORNELL 257 LLC, CORNELL 259 LLC,
CORNELL 46 LLC, CORNELL BEDFORD
HOLDINGS LLC, CORNELL BEDFORD MEMBER
DE LLC, CORNELL CROWN LLC, CORNELL KEAP
HOLDINGS LLC, CORNELL KENT HOLDINGS LLC,
CORNELL MEEKER HOLDINGS LLC,
CORNELL MESEROLE DE LLC,
CORNELL MESEROLE HOLDINGS LLC, CORNELL
MYRTLE II LLC, CORNELL MYRTLE LLC,
CORNELL REALTY MANAGEMENT LLC,
CORNELL SCHOLLES HOLDINGS LLC,
CORNELL WEST 34 II LLC, CORNELL WEST 34
OWNER LLC, and
ISAAC HAGER a/k/a ISSAC HAGER a/k/a
YITZCHER HAGER a/k/a YITZCHOK HAGER
a/k/a YITZCHOK R. HAGER,

Defendants.

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KIMBERLY A. AHRENS, ESQ., an attorney duly admitted to practice law before the Courts of the Southern District of New York, affirms the following under penalty of perjury:

1. I am an attorney at Meltzer, Lippe, Goldstein & Breitstone, LLP, attorneys for Defendants in this action. I am familiar with the facts and circumstances set forth herein.

2. I make this affirmation in support of Defendants' motion for an Order dismissing the Amended Complaint entirely, and for such other and further relief as this Court deems just and proper.

3. I conducted a search of the New York State Department of State, Division of Corporations Business Entity Search for "Cornell Realty LLC" which did not proffer any results. An entity entitled "Cornell Realty, LLC" that was filed in Westchester County exists, but this entity is not affiliated with Defendants and does not appear to be the "Cornell Realty" to whom Trustee refers in the Amended Complaint. Cornell Realty LLC does not appear to exist, at least in New York.

4. Annexed hereto as **Exhibit A** is a true and correct copy of the August 29, 2024 Transcript of Adversary Proceeding before the Honorable Kyu Y. Paek.

Dated: January 7, 2025
Mineola, New York

s/Kimberly Ahrens
Kimberly A. Ahrens